

PAOLI RAIL YARD SITE
ADMINISTRATIVE RECORD FILE *
INDEX OF DOCUMENTS

III. REMEDIAL RESPONSE PLANNING

1. Letter of transmittal to Mr. Mark Griffen, U.S. Pollution Control, Inc., from Mr. Paul Miller, Groundwater Technology, Inc., re: Transmittal of a Waste Profile Sheet and analytical sampling results, 2/13/90. P. 300001-300015. The Waste Profile Sheet and the analytical results are attached.
2. Waste Profile Sheet for PCB waste shipments, 2/16/90. P. 300016-300018.
3. Handwritten letter to Mr. Don Dew, U.S. Pollution Control, Inc., from Mr. Paul Miller, Groundwater Technology, Inc., re: Transmittal of PCB analysis information, 4/9/90. P. 300019-300026. Pesticide Organics Analysis Data Sheet information, an activity report, and a transaction schedule are attached.
4. Memorandum to Mr. Stephen Young from Mr. Ken Hall, U.S. Pollution Control, Inc., re: Waste shipment information, 5/31/90. P. 300027-300029. Two memorandums regarding waste shipment are attached.
5. Report: Final Remedial Investigation and Risk Assessment (RI/RA) Report for the Paoli Rail Yard RI/FS, Paoli, Pennsylvania, Volume I, prepared by Groundwater Technology, Inc., 10/29/90. P. 300030-300548.
6. Report: Final Remedial Investigation and Risk Assessment (RI/RA) Report for the Paoli Rail Yard RI/FS, Paoli, Pennsylvania, Volume II, prepared by Groundwater Technology, Inc., 10/29/90. P. 300549-301048.

* Administrative Record File available 7/31/92.

7. Report: Final Remedial Investigation and Risk Assessment (RI/RA) Report for the Paoli Rail Yard RI/FS, Paoli, Pennsylvania, Volume III, prepared by Groundwater Technology, Inc., 10/29/90. P. 301049-301073.
8. Report: Toxicity Assessment for TCDD and Other Dibenzofurans and Dibenzodioxins, prepared by Washington Occupational Health Associates, Inc., 10/29/90. P. 301074-301101.
9. Letter to Ms. Ruth M. Stone, Pennsylvania Department of Environmental Resources (PADER), from Mr. Benjamin G. Stonelake, Jr., Blank, Rome, Comisky, & McCauley; Mr. Mitchell A. Burack, Pepper, Hamilton, & Scheetz; and Mr. Dennis Moore, Amtrak, re: Responses to comments in a letter in connection with the submission of the revised RI report regarding the Paoli Rail Yard, 10/30/90. P. 301102-301103.
10. Preliminary Natural Resource Survey, Paoli Rail Yard, Findings of Facts, prepared by National Oceanic and Atmospheric Administration, 1/14/91. P. 301104-301119.
11. Letter to Mr. Eric W. Johnson, U.S. EPA, from Ms. Ruth M. Plant, PADER, re: Determination of a preliminary list of State Applicable or Relevant and Appropriate Requirements (ARARs) for air, groundwater, soil, wetlands/floodplain, waste management, and public drinking water supplies, 1/23/91. P. 301120-301127. A list of sources exempted from plan approval requirements is attached.
12. Letter to Mr. Eric Johnson, U.S. EPA, from Ms. Ruth M. Plant, PADER, re: Revisions to the preliminary ARARs list, 2/6/91. P. 301128-301134. Two letters regarding ARARs determinations and a memorandum regarding ground water remediation are attached.
13. Report: Feasibility Study Report for the Paoli Rail Yard RI/FS, Paoli, Pennsylvania, prepared by

Groundwater Technology, Inc., 6/91. P. 301135-301759. A cover letter is attached.

14. Memorandum to Mr. Eric W. Johnson, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Review of the Feasibility Study (FS), 8/12/91. P. 301760-301778.
A memorandum regarding review of the final Feasibility Study, a list of site activities, and five memorandums regarding review of the final Remedial Investigation/ Risk Assessment are attached.
15. Memorandum to Mr. Eric Johnson, U.S. EPA, from Mr. Richard L. Brunner, U.S. EPA, re: Soil PCB clean-up levels and related cancer risks, 8/26/91. P. 301779-301784.
16. Memorandum to Mr. Eric Johnson, U.S. EPA, from Mr. Richard L. Brunner, U.S. EPA, re: Addendum to the Risk Assessment, 8/22/91. P. 301785-301795.
17. Report: Addendum to the Final Feasibility Study Report, Paoli Rail Yard RI/FS, Paoli, Pennsylvania, prepared by Groundwater Technology, Inc., 12/6/91. P. 301796-301876.
18. Letter to Ms. Pamela Lazos, U.S. EPA, from Mr. Benjamin G. Stonelake, Jr., Blank, Rome, Comisky, & McCauley, re: Relocation of all activities conducted at the Paoli Rail Yard by Southeastern Pennsylvania Transit Authority (SEPTA), 12/13/91. P. 301877-301879.
19. Memorandum to Mr. Harry Harbold, U.S. EPA, from Mr. Richard L. Brunner, U.S. EPA, re: Cancer risks for construction workers at the Paoli Rail Yard, 1/8/92. P. 301880-301881.
20. Table, Average Toxicity Equivalents for Remaining Sample Locations at the Paoli Site, (undated), P. 301882-301882.

21. Letter to Mr. Harry Harbold, U.S. EPA, from Mr. Paul C. Miller, Groundwater Technology, Inc., re: Summary of sample results sorted by location, tax lot, or street address, 3/2/92. P. 301883-301912. The sample results are attached.
22. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Ruth M. Plant, PADER, re: Comments on the draft Proposed Plan, 3/10/92. P. 301913-301917.
23. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Ruth M. Plant, PADER, re: Comments on the second draft Proposed Plan, 3/11/92. P. 301918-301919.
24. Proposed Plan, Paoli Railyard Superfund Site, Paoli, Chester County, Pennsylvania, (undated). P. 301920-301938.
25. Maps: Paoli Rail Yard Site, prepared by Groundwater Technology, Inc., (undated). P. 301939-301947. (These maps are an attachment to document #21, letter dated 3/2/92, regarding a summary of sample results.)
26. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Cindy L. Rice, U.S. Department of the Interior, re: Comments on the Proposed Plan, 3/10/92. P. 301948-301971. A letter regarding the transmittal of documentation and a report entitled A Discussion of PCB Target Levels in Aquatic Sediments are attached.
27. Report: Assessment of Potential PCB Contamination, Paoli Electric Car Shop, Paoli, Pennsylvania, prepared by WAPORA, Inc., 6/81. P. 301972-302071.
28. Letter to Mr. Steven J. Engelmyer, U.S. Department of Justice, from Mr. Ben Stonelake for Mr. C. Gary Wynkoop, Blank, Rome, Comisky and McCauley, re: Transmittal of a listing of SEPTA employees PCB blood levels, 10/7/86. P. 302072-302076. The listing is attached.
29. Memorandum to Mr. Bill Steuteville, U.S. EPA, from Mr. Bruce Molholt, U.S. EPA, re: PCB blood levels of SEPTA employees averaged over a four year period, 10/15/86. P. 302077-302077.

30. Memorandum to Mr. Charles J. Walters, U.S. EPA, from Dr. Stephen Margolis, U.S. Department of Health and Human Services, re: Addendum to the January 28, 1986 Preliminary Assessment, 3/13/86. P. 302078-302080.
31. Report: Addendum to Appendix IV, Quality Assurance Project Plan (QAPjP) for the Remedial Investigation/Feasibility Study, Levels I and III Off-Site Soil Sampling at the Paoli Rail Yard, Paoli, Pennsylvania, prepared by Groundwater Technology, Inc., 9/21/87. P. 302081-302346.
32. Letter to Mr. Bruce P. Smith, U.S. EPA, from Mr. John K. Bainbridge, Department of Health and Human Services, re: Results of PCB sampling and threat of exposure to contamination at the site, 1/13/87. P. 302347-302347.
33. Memorandum to Mr. Charles J. Walters, U.S. EPA, from Dr. B. Kim Mortensen, U.S. Department of Health and Human Services, re: Information concerning contamination and health threats at the site, 2/4/87. P. 302348-302350.
34. Report: Final Report Technical Assistant to the Chester County, Pennsylvania Health Department, Exposure Study of Persons Possibly Exposed to Polychlorinated Biphenyls in Paoli, Pennsylvania, prepared by The Agency for Toxic Substances and Disease Registry (ATSDR), 11/87. P. 302351-302377.
35. Report: Second Revised Work Plan for the Remedial Investigation/Feasibility Study, Paoli Rail Yard, Paoli, PA, prepared by Groundwater Technology, Inc., 3/15/88. P. 302378-302743. The following are attached:
 - a) a letter, dated April 11, 1988, regarding transmittal of corrected page 2-31 of the revised Work Plan;
 - b) the correct version of page 2-31;

- c) a letter, dated April 4, 1988, regarding transmittal of Addendum 1 to the revised Work Plan;
 - d) revised pages for the Work Plan.
- 36. U.S. EPA Potential Hazardous Waste Site, Site Identification Report, Paoli Rail Yard, Paoli, PA, 3/28/88. P. 302744-302757.
 - 37. Report: Remedial Investigation Site Operations Plan, RISOP, for the Remedial Investigation and Feasibility Study, Paoli Rail Yard, Paoli, PA, prepared by Groundwater Technology, Inc., 5/27/88. P. 302758-303205.
 - 38. Memorandum to the record from Mr. Stephen D. Von Allmen, ATSDR, re: Determination of health assessment equivalency, 9/30/88. P. 303206-303206.
 - 39. Memorandum to Ms. Anita Miller and Ms. Alyce Fritz, U.S. EPA, from Mr. Gregg Crystall, U.S. EPA, re: Notification that potential damages to natural resources may result from releases at the site, (undated). P. 303207-303207.
 - 40. Memorandum to Mr. Christopher Pilla, U.S. EPA, from Dr. Bruce Molholt, U.S. EPA, re: Assessment of PCB contamination at the site, (undated). P. 303208-303209.
 - 41. Report: Addendum to Remedial Investigation Site Operations Plan for the Remedial Investigation and Feasibility Study, Paoli Rail Yard, Paoli, PA, (no author cited), (undated). P. 303210-303575.
 - 42. Report: Final Report, Technical Assistance to the Chester County, Pennsylvania Health Department, Exposure Study of Persons Possibly Exposed to Polychlorinated Biphenyls in Paoli, Pennsylvania, prepared by ATSDR, 11/87. P. 303576-303603.
 - 43. Transcript of a public meeting, regarding the Proposed Plan, Paoli Rail Yard Superfund Site, prepared by All Points Reporting, 3/24/92. P. 303604-303727.

44. Memorandum to Mr. Harry Harbold, U.S. EPA, from Ms. Carol Ann Gross, U.S. EPA, re: Classification of a ground water aquifer at the site, 4/23/92. P. 303728-303729.
45. Report: Comments on EPA's Proposed Remedial Action Plan (PRAP) for the Paoli Rail Yard, prepared by Groundwater Technology, Inc., 5/15/92. P. 303730-303982.
46. Letter to Mr. Harry Harbold, U.S. EPA, from Mr. James R. Kolva, U.S. Department of the Interior, re: Observations made concerning sampling activities to be conducted following a May 14, 1992 visit to the site, 5/15/92. P. 303983-303984.
47. Letter to Mr. Harry Harbold, U.S. EPA, from Mr. Tony De Angelo, Amtrak, re: Comments on the Proposed Plan, 5/15/92. P. 303985-303986.
48. Letter to Dr. Edwin B. Erikson, U.S. EPA, from Mr. Charles P. Clapper, Jr., National Park Service, re: Comments on the effect of PCB contamination on natural resources at the Valley Forge National Historical Park, 5/15/92. P. 303987-303988.
49. Letter to Mr. Harry Harbold, U.S. EPA, from Dr. Melvyn Kopstein, re: Transmittal of comments on the Proposed Plan on behalf of the law firms of Kohn, Nast, and Graft and Klehr, Harrison, Harvey, Branzburg & Ellers, 5/15/92. P. 303989-304009. The comments and an excerpt from the Code of Federal Regulations concerning preliminary assessment for removal actions are attached.
50. Letter to Mr. Harry Harbold, U.S. EPA, from Mr. C. Mark Hersh, Pennsylvania Fish Commission, re: Comments on the Proposed Plan, 5/21/92. P. 304010-304014.
51. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Cindy L. Rice, U.S. Department of the Interior, re: Department of the Interior's preferred course of action for removal operations at the site, 5/21/92. P. 304015-304016.

52. Report: Technical Analysis of the Paoli Rail Yard NPL Site, prepared by the U.S. Department of the Interior, 6/9/92. P. 304017-304032.
53. Memorandum to Mr. Harry Harbold, U.S. EPA, from Mr. Richard L. Brunner, U.S. EPA, re: Calculation of cancer risks to individuals inhaling airborne particles contaminated with polychlorinated biphenyls (PCBs), 6/15/92. P. 304033-304038.
54. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Ruth M. Plant, PADER, re: Comments on the Proposed Plan, 5/14/92. P. 304039-304042.
55. Record of Decision, Paoli Rail Yard Superfund Site, Paoli, Chester County, Pennsylvania, 7/21/92. P. 304043-304162.

Explanation of Significant Differences

56. Explanation of Significant Differences, Paoli Rail Yard Superfund Site, Paoli, Chester County, Pennsylvania, 4/2/97. P. 304163-304167.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. U.S. EPA Fact Sheet, Paoli Rail Yard, 5/90. P. 500001-500004.
2. U.S. EPA Fact Sheet, Paoli Rail Yard, 6/91. P. 500005-500008.
3. Newspaper article entitled "Paoli Yard's PCB Levels Grow Worse," Philadelphia Inquirer, 3/14/86. P. 500009-500009.
4. Letter to Mr. Reid Kanaley, Philadelphia Inquirer, from Dr. Bruce Molholt, U.S. EPA, re: Information concerning carcinogenic chemicals, 6/25/87. P. 500010- 500015. A newspaper article concerning PCB danger to humans is attached.
5. Report: Community Relations Plan for the Paoli Rail Yard Site, prepared by Dynamac Corporation, 4/17/91. P. 500016-500060.
6. Letter to Ms. Carrie Dietzel, U.S. EPA, from Mr. Joseph I. Moorhatch, re: Opposition to the Proposed Plan and comments on site activities, 4/22/92. P. 500061-500062.
7. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Mitsie Toland, Open Land Conservancy, re: Opposition to Alternative 4 and support of Alternative 1 for site clean up, 4/24/92. P. 500063-500066. A site map and a business card are attached.
8. Letter to Mr. Harry Harbold, U.S. EPA, from Mr. Norman B. and Mrs. Rita H. Nields, re: Comments on the proposed remedial action alternatives, 5/14/92. P. 500067-500068. A petition is attached.
9. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Ann A. Baines, Valley Forge Trout Unlimited, re: Comments on the proposed Record of Decision and support of Alternative 5A, 5/15/92. P. 500069-500070.

10. Letter to Mr. Harry Harbold, U.S. EPA, from Ms. Tina Stonorov Daly, Green Valleys Association, re: Comments on the Proposed Plan, 5/15/92. P. 500071-500072.

11. Letter to Mr. Harry Harbold, U.S. EPA, from Mr. James Carroll, re: Questions about site activities and contamination of buildings and soils, (undated). P. 500073-500076. A handwritten letter regarding testing performed on Mr. Carroll's property and Map 10, Off-Site Soil Sampling Program, are attached.

SITE SPECIFIC GUIDANCE DOCUMENTS INCLUDED

1. Report: Enforcement Project Management Handbook, prepared by U.S. EPA, 7/89.
2. Report: Risk Assessment Guidance for Superfund Volume I, Human Health Evaluation Manual (Part A), Interim Final, prepared by U.S. EPA, 12/89.

BIBLIOGRAPHY OF SITE-SPECIFIC GUIDANCE DOCUMENTS

1. Costs of Remedial Response Actions at Uncontrolled Hazardous Waste Sites, prepared by H.L. Rishel, et al, SCS Engineers, and O.W. Albrecht, MERL, 1/1/81.
2. Health Assessment Documents (58 Chemical Profiles) Volume 28: Acetone, Arsenic, Asbestos, Barium, Benzene, Benzo(A)Pyrene, Cadmium, Carbon Tetrachloride, Chlorobenzene, DDT, 1,1-Dichloroethane, 1,2-Dichloroethylene; Volume 29: 1,1-Dichloroethylene, Ethylbenzene, Glycol Ethers, Hexachlorobenzene, Hexachlorobutadiene, Hexachlorocyclopentadiene, Hexavalent Chromium, Iron (and compounds), Lead Lindane, Manganese (and compounds), Mercury, Methyl Ethyl Ketone, Methylene Chloride, Naphthalene, Nickel, Pentachlorophenol, Phenol, Phenanthrene; Volume 30: Polychlorinated Biphenyls (PCBs), Polycyclic Aromatic Hydrocarbons (PAHs), Pyrene, Selenium (and compounds), Sodium Cyanide, Sulfuric Acid, 2,3,7,8-Tetrachlorodibenzo-p-Dioxin, 1,1,2,2-Tetrachloroethane, Tetrachloroethylene, Toluene, 1,1,2-Trichloroethane, 1,1,1-Trichloroethane, Trichloroethylene, 2,4,5-Trichlorophenol, 2,4,6-Trichlorophenol, Trivalent Chromium, Vinyl Chloride, Xylene, Zinc (and compounds), prepared by ORD/OHEA/ECAO and OSWER/OERR, 9/1/84. EPA-540/1-86/001-058
3. CERCLA Compliance with Other Environmental Statutes, prepared by J.W. Porter, OSWER, 10/2/85. A Potentially Applicable or Relevant and Appropriate Requirements report is attached.
OSWER #9234.0-2
4. Endangerment Assessment Guidance, (Secondary Reference), prepared by J.W. Porter, OSWER, 11/22/85. OSWER #9850.0-1
5. Superfund Remedial Design and Remedial Action Guidance, prepared by OERR, 6/1/86.
OSWER #9355.0-4A
6. Guidelines for Carcinogen Risk Assessment (Federal Register, September 24, 1986, P. 33992), prepared by U.S. EPA, 9/24/86.

7. Guidelines for Exposure Assessment (Federal Register, September 24, 1986, P. 34042), prepared by U.S. EPA, 9/24/86.
8. Superfund Public Health Evaluation Manual, prepared by OERR and OSWER, 10/1/86.
OSWER #9285.4-1
9. Data Quality Objectives for Remedial Response Activities: Development Process, prepared by CDM Federal Programs Corporation, and OERR/OWPE, 3/1/87.
OSWER #9355.0-7B
10. Guidance on Implementation of the "Contribute to Remedial Performance" Provision, prepared by OSWER, 4/6/87.
OSWER #9360.0-13
11. A Compendium of Superfund Field Operations Methods, prepared by OERR and OWPE, 12/1/87.
OSWER #9355.0-14
12. Superfund Exposure Assessment Manual, prepared by OERR, 4/1/88.
OSWER #9285.5-1
13. Information on Drinking Water Action Levels, prepared by T. Fields Jr., OSWER/ERD, 4/19/88. The following documents are attached:
 - a) a memorandum regarding releases from lawfully applied pesticides;
 - b) a memorandum regarding DBOP Contamination;
 - c) Guidance for Ethylene Dibromide in Drinking Water.
14. Interim Guidance on Potentially Responsible Party Participation in Remedial Investigations and Feasibility Studies, prepared by J.W. Porter, OSWER, 5/16/88.
OSWER #9835.1a
15. CERCLA Compliance with Other Laws Manual Draft Guidance, prepared by OERR, 8/8/88.

OSWER #9234.1-01

16. Technology Screening Guide for Treatment of CERCLA Soils and Sludges, prepared by OSWER/OERR, 9/1/88.
EPA-540/2-88/004
17. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, prepared by
OSWER/OERR, 10/1/88.
OSWER #9355.3-01
18. User's Guide to the Contract Laboratory Program,
prepared by OERR/CLP Sample Management Office,
12/1/88. OSWER #9240.0-1
19. Guidance on Remedial Actions for Superfund Sites with PCB Contamination, prepared by U.S. EPA, 8/90.
OSWER #9355.4-01